

Philip J. Loree Jr. (PL-2213)
Loree & Loree
800 Third Avenue, 28th Floor
New York, New York 10022
(646) 253-0560
(516) 627-1720 (alt.)
(516) 941-6094 (mobile)

*Counsel for Plaintiff Geo-Group
Communications, Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- -X
GEO-GROUP COMMUNICATIONS, INC.,

Plaintiff,

Index No. 15-cv-01756
(KPF)

-v.-

RAVI CHOPRA; MAHENDRA SHAH; VIPIN
SHAH; 728 MELVILLE PETRO LLC; KEDIS
ENTERPRISES LLC; JMVD HILLSIDE LLC;
NYC TELECOMMUNICATIONS CORP.; and
SHALU SURI,

Defendants.

----- -X

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon, and for the reasons stated in, Plaintiff Geo-Group Communications, Inc.'s ("Geo-Group")'s accompanying Declaration of Govind Vanjani Executed on October 4, 2019 (the "Vanjani Dec"), Memorandum of Law in Support of Motion to Reopen Case, and upon all exhibits and papers filed in this action, Geo-Group will move this Court on a date convenient for the Court, or as soon thereafter as counsel may be heard, for an order pursuant to Fed. R. Civ. P. 15(a), (c), & (d); Fed. R. Civ. P. 20(a)(2)

& (3); Fed. R. Civ. P. 21; Fed. R. Civ. P. 54(b); and the Court's inherent power:

a. Reopening pursuant to Fed. R. Civ. P. 54(b) the case against dismissed defendants 728 Melville Petro LLC ("728 Melville"), Kedis Enterprises LLC ("Kedis"), JMVD Hillside LLC ("Hillside"), and Mahendra Shah ("M. Shah");

b. Granting Geo-Group leave to join Sanjiv Chand to this action, and assert against him claims for actual fraudulent conveyance, and fraud on the court arising from false statements made in paragraphs 10, 11, and 13 of Mr Chand's Third Affidavit (Dk. 115-1) (the "False Statements");

c. Granting Geo-Group leave to file and serve an amended and supplemental complaint asserting against dismissed defendants Hillside, Kedis, and 728 Melville claims for actual and constructive fraudulent conveyance;

d. Granting Geo-Group leave to file and serve an amended and supplemental complaint asserting against dismissed defendant Mahendra Shah claims for actual fraudulent conveyance arising out of the \$660,000 in transfers (the "Transfers") Jaina made to, or for the benefit of, Hillside, Kedis, Sanjiv Chand, and 728 Melville, and also for his own benefit;

e. Granting Geo-Group leave to file and serve an amended and

supplemental complaint asserting against Sanjiv Chand claims for actual fraudulent transfers arising out of the Transfers, and for fraud on the Court and Geo-Group arising out of the False Statements; and

f. For any other appropriate relief that the Court may deem warranted.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's September 24, 2019 Order (Dk. 271), answering papers must be served by November 1, 2019, and reply papers, if any, by November 15, 2019.

Dated: New York, New York
October 4, 2019

Respectfully submitted,

By: /s/ Philip J. Loree Jr.
Philip J. Loree Jr. (PL-2213)
800 Third Avenue, 28th Floor
New York, New York 10022
(646) 253-0560
(516) 627-1720 (alt.)
(516) 941-6094 (mobile)
PJL1@LoreeLawFirm.com

*Counsel for Plaintiff Geo-
Group Communications, Inc.*

To: All Counsel of Record and Pro Se
Parties (via ECF)